

**CAT 4****FILED**  
9/6/2024

JC

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISIONUNITED STATES OF AMERICA  
  
v.  
  
ALLEN J. FOX-MORRIS, JR.

Case No.:

**24-CR-416**Violation: Title 18, United States  
Code, Section 1956(h)

The ACTING UNITED STATES ATTORNEY charges:

Between on or about December 2021 and on or about May 2022, in the  
Northern District of Illinois, Eastern Division, and elsewhere,ALLEN J. FOX-MORRIS, JR., **JUDGE GETTLEMAN**  
**MAGISTRATE JUDGE JANTZ**defendant herein, did conspire with Individual A, and others known and unknown,  
to commit an offense in violation of Title 18, United State Code, Section 1956, namely,  
to knowingly conduct a financial transaction affecting interstate and foreign  
commerce, which involved the proceeds of a specified unlawful activity, namely, wire  
fraud, knowing that the transaction was designed in whole and in part to conceal and  
disguise the nature, location, source, ownership, and control of the proceeds of said  
specified unlawful activity, and that while conducting such financial transaction  
knew that property involved in the financial transaction represented the proceeds of  
some form of unlawful activity, in violation of Title 18, United States Code, Section  
1956(a)(1)(B)(i);

In violation of Title 18, United States Code, Section 1956(h).

MICHELLE  
PETERSEN

 Digitally signed by MICHELLE  
 PETERSEN  
 Date: 2024.09.02 22:22:34 -05'00' for MP

ACTING UNITED STATES ATTORNEY